IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

ARTHREX, INC. :

:

Plaintiff, :

.

v. : C.A. No. 22-cv-00465-CFC

:

NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA, and FEDERAL INSURANCE COMPANY,

:

Defendants. :

DEFENDANTS' MOTION TO TRANSFER PURSUANT TO 28 U.S.C. § 1404(a)

Defendants National Union Fire Insurance Company of Pittsburgh, Pa. and Federal Insurance Company hereby respectfully move the Court to transfer the above-captioned action to the Middle District of Florida, pursuant to 28 U.S.C. § 1404(a). For the reasons set forth in Defendants' Opening Brief in Support of their Motion to Transfer filed contemporaneously herewith, Defendants respectfully request that the Court grant this Motion to Transfer. A proposed order is also attached to this Motion.

HEYMAN ENERIO GATTUSO & HIRZEL LLP

SMITH, KATZENSTEIN & JENKINS LLP

/s/ Aaron M. Nelson

Kurt M. Heyman (# 3054) Aaron M. Nelson (# 5941) 300 Delaware Ave., Ste 200 Wilmington DE 19801 (302) 472-7300 kheyman@hegh.law anelson@hegh.law

Attorneys for Defendant National Union Attorneys for Defendant Federal Fire Insurance Company of Pittsburgh, Pa.

/s/ Robert J. Katzenstein

Robert J. Katzenstein (# 378) Julie M. O'Dell (#6191) 1000 West Street, Suite 1501 Wilmington, DE 19801 (302) 652-8400

RJK@sklaw.com jodell@skjlaw.com

Insurance Company

OF COUNSEL:

CARLTON FIELDS, P.A.

Steven J. Brodie Aaron S. Weiss Daniel G. Enriquez 2 MiamiCentral 700 NW 1st Avenue, Ste 1200 Miami, FL 33136 (305) 530-0050 sbrodie@carltonfields.com aweiss@carltonfields.com denriquez@carltonfields.com

OF COUNSEL:

LLOYD, GRAY, WHITEHEAD & **MONROE** Stephen E. Whitehead Jennifer W. Wall Mallory S. Hall 880 Montclair Road, Suite 100 Birmingham, AL 35213 Telephone: 205-967-8822 Facsimile: 205-967-2380

steve@lgwmlaw.com jwall@lgwmlaw.com mhall@lgwmlaw.com

Dated: May 12, 2022